



In addition, the Court **GRANTS** the *amici curiae* tax law professors' motion for leave to file an amicus brief, ECF No. 37, and **DENIES-AS-MOOT** the *amici curiae* tax law professors' motion for leave to allow their *pro hac vice* attorneys to appear without the presence of local counsel, ECF No. 53.

**IT IS SO ORDERED.**

s/ Lydia Kay Griggsby  
LYDIA KAY GRIGGSBY  
United States District Judge